



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board

Central Coast Region

Internet Address: <http://www.swrcb.ca.gov/rwqcb3>
895 Aerovista Place, Suite 101, San Luis Obispo, California 93401
Phone (805) 549-3147 • FAX (805) 543-0397



Arnold Schwarzenegger
Governor

February 18, 2009

Danny Hillstock
Stormwater Management Program Coordinator
City of Hollister
375 Fifth Street
Hollister, CA 95023

Dear Mr. Hillstock:

STORMWATER MANAGEMENT PROGRAM ANNUAL REPORT FOR FY 2007-08, CITY OF HOLLISTER, COUNTY OF SAN BENITO, WDID #3 35MS04062

Central Coast Water Board (Water Board) staff received the City of Hollister's (City) Stormwater Management Program Annual Report for Fiscal Year 2007-08 (Annual Report) on December 8, 2008. We appreciate the City's efforts to comply with the statewide General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) (General Permit). We find that the Stormwater Management Program (SWMP) is a comprehensive program that shows good progress toward compliance with the General Permit. In addition the City has gone beyond other communities of similar size to develop a water quality monitoring program at all its stormwater outfalls.

The purpose of the annual report is to summarize the City's stormwater management activities, assess the effectiveness of the SWMP and its compliance with the conditions of the General Permit, and summarize the stormwater management activities the City plans to undertake in the next reporting cycle, including any proposed changes to the SWMP. We are providing the following comments on the annual report to improve the SWMP document, the implementation of the SWMP, and the content of the annual report to satisfy General Permit requirements.

Please review this letter closely, as the issues listed below require further action. There are two types of comments: violations of the General Permit which must be corrected, and improvements to the SWMP that are required to meet the Maximum Extent Practicable (MEP) standard. In addition, two levels of further action are required. In some cases, the City must respond with an addendum to this annual report. In other cases, the City must act prior to the next annual report. Throughout the letter the required response is shown in bold text for clarity. Water Board staff will meet with you after you have had an opportunity to review this letter in order to establish a date by which the additional information must be submitted to the Water Board.

California Environmental Protection Agency



Recycled Paper

I. Overall Program

A. Best Management Practice (BMP) Implementation and Effectiveness Reporting

Issue

The Annual Report does not contain implementation data for some activities scheduled for implementation during FY 2007-08. Failure to report this information in each annual report is a violation of General Permit Section F.1.

Action: Please provide, **as an addendum to this Annual Report**, complete implementation data for the following BMPs: PE-5 (documentation of calls), PP-1B (meeting to discuss progress), ID-2B (outfall inspection), ID-5, and ID-6 (documentation of calls).

Issue

The Annual Report does not contain effectiveness data for some activities scheduled for implementation during FY 2007-08. Failure to report effectiveness data for all identified BMPs is a violation of General Permit Section F.1.

Action: Please provide, **as an addendum to this Annual Report**, complete effectiveness data for the following BMPs: PE-2 (utility bill mailing), PE-3, PE-5, PP-1B (meeting to discuss progress), PP-3, ID-2B (outfall inspection), ID-5, and ID-6.

B. Responsible Party

Issue

While the SWMP indicates the City department or staff responsible for each BMP, it is unclear on who is responsible for the implementation of the SWMP as a whole. Failure to clearly identify in the SWMP the person or persons currently responsible for coordination and implementation of the SWMP, is a violation of General Permit Section D.4.

Action: **Prior to the next annual report**, revise the SWMP to indicate the City department or staff currently responsible for coordinating and implementing the SWMP.

C. Pollutants of Concern

Issue

Section 303(d) of the Clean Water Act lists the San Benito River as impaired for fecal coliform. In addition, the Environmental Protection Agency (EPA) has approved Total Maximum Daily Load (TMDL) allocations for sediment in the San Benito River, and Water Board staff is in the process of developing a TMDL for fecal coliform. Currently the SWMP does not list fecal coliform as a pollutant of concern (POC).

Action: **Prior to the next annual report**, revise the SWMP to list fecal coliform as a POC.

Issue

The SWMP does not currently identify known and potential sources for all POCs. Potential sources can include particular land uses, business types, or activities.

Action: **Prior to the next annual report**, revise the SWMP to include a BMP to identify the source(s) of each POC, starting with the most serious threats, and reducing them in the City's stormwater, where they exist, to the maximum extent practicable (MEP).



Issue

The intent of the General Permit is that MS4s be guided by identified POCs in the development and prioritization of BMPs. Currently the SWMP does not make an explicit connection between listed POCs and program BMPs.

Action: Prior to the next annual report, revise the SWMP to make the following changes:

- For each POC, list the program BMPs which address that pollutant.
- Indicate which POCs constitute the most serious threat(s) to stormwater and/or receiving water quality.
- Indicate how the selected BMPs are most effective at reducing or eliminating the most serious POCs.
- Include a BMP to comply with loads or concentrations allocated to the City for those pollutants with approved TMDLs.

D. Assessing Program Effectiveness**Issue**

The annual report suggests that BMPs were considered effective if they were implemented successfully. However, the appropriate measure of the effectiveness of SWMP activities is their success at effecting changes which reduce pollutants to the MEP and protect water quality.

Action: Prior to the next annual report, revise the SWMP to include a BMP to develop a strategy for evaluating program effectiveness. The Water Board recommends using the six "outcome levels" identified by the California Stormwater Quality Association (CASQA). The strategy should include the following elements:

- Identification of a target outcome level appropriate for each BMP, keeping in mind that the purpose of the SWMP as a whole is to achieve CASQA outcome level 6, "Protecting Receiving Water Quality."
- Development of a schedule for increasing the effectiveness of each BMP to its target outcome level over time, with the goal of achieving the target outcome level by the end of year five.
- Development of effectiveness assessment measures for each BMP that will allow the City to determine whether the BMP is achieving its particular (interim and target) outcome level.
- Evaluation of BMPs in successive annual reports according to the effectiveness measures and outcome levels identified through this strategy.
- Evaluation of the appropriateness of BMPs for reducing pollutants in stormwater to the MEP and protecting water quality, and replacing or discontinuing BMPs which are deemed ineffective.
- Evaluation of effectiveness assessment measures and replacing them as necessary.
- Development of a plan for achieving outcome Level 6, "Protecting Receiving Water Quality," for the program as a whole.

II. MCM#1: Public Education and Outreach

The purpose of this MCM is to distribute educational materials, or conduct equivalent outreach activities, which explain the impacts of stormwater discharges on water bodies and describe steps the public can take to reduce pollutants in stormwater. The City is using a variety of materials, media, and delivery vehicles to disseminate relevant stormwater information to a variety of audiences. In particular, creation of the "Spotlight on Hollister" event, and use of the event to distribute stormwater information and respond to public questions and comments.

California Environmental Protection Agency



Recycled Paper

demonstrates the City's commitment and effort to reduce pollutants in stormwater. Water Board staff provides the following comments to further improve this MCM.

A. Classroom Education

Issue

The Annual Report describes the classroom education provided by the Santa Benito County Water Resource Association under BMP PE-6, Event Participation.

Action Required: For greater clarity, revise the SWMP to create a separate BMP for the classroom education program **prior to the next annual report**. The BMP should include a measurable goal and effectiveness assessment measure.

B. Website

Issue

The data reported in Attachment 1 is difficult to decipher.

Action Required: In the next annual report (and all following annual reports), provide a text summary of the website hit data. The summary should include a discussion of the significance of the data and a comparison with previous years.

C. Education and Outreach Materials

Issue

Since the SWMP does not currently describe potential sources of POCs, it is unclear whether educational materials target each POC and/or potential source effectively.

Action: Prior to the next annual report, revise the SWMP to identify potential source activities or groups for each POC, and tailor education/outreach materials to address them.

Issue

Education/Outreach materials do not currently describe the prohibitions and penalties associated with non-stormwater discharges.

Action: Prior to the next annual report, revise the SWMP to include a BMP to revise all education and outreach materials within one year of the adoption of the City's illicit discharge ordinance.

D. Community-Based Social Marketing

Issue

Community-based social marketing is an effective strategy for effecting change in a target audience's thought and behavior. The approach consists of the following elements:

- Identifying barriers to and benefits from a desired activity,
- Utilizing a variety of tools that have been shown to be effective in changing behavior,
- Removing external barriers to the activity.

The Water Board has determined that applying Community-Based Social Marketing strategies is necessary for reducing pollutants in stormwater to the MEP.

Action Required: Prior to the next annual report, revise the SWMP to include a BMP that commits to assessing community-based marketing strategies and incorporating them into the program, where appropriate, by the end of FY 2010-11. (More information on the strategy is available at www.cbsm.com).



III. MCM #2: Public Involvement/Participation

The two purposes of this MCM are to satisfy State and local public notice requirements and to involve the public in the development and implementation of the SWMP. In FY 2007-08 the City held three river clean-up days with approximately 60 volunteers involved with each event. The City's stormwater website also includes a vehicle for the public to submit comments or questions regarding the SWMP. Water Board staff provides the following comment to further improve this MCM.

A. Publication of SWMP Assessment Results

Issue

The SWMP does not yet contain a measure for making program assessment results available to stakeholders and to the public.

Action Required: Please develop, **as an addendum to this annual report**, a plan for making the annual report and this letter available to stakeholders and the public. **Prior to the next annual report**, revise the SWMP to include a BMP for making future annual reports and Water Board staff comments available to the public.

IV. MCM #3: Illicit Discharge Detection and Elimination

The purposes of this MCM are 1) to develop, implement, and enforce a program to detect and eliminate illicit discharges; 2) to develop and implement a plan to detect, address, and—where appropriate—prohibit non-stormwater discharges; and 3) to inform public employees, businesses and the general public of the hazards associated with illicit discharges and improper disposal of waste. The City has worked toward these goals by conducting video surveillance of its stormdrain pipes and is in the process of adopting an illicit discharge ordinance. Water Board staff provides the following comments to further improve this MCM.

A. Monitoring Program

Issue

The City's monitoring program is a very useful tool for identifying POCs, evaluating the effectiveness of the SWMP and individual BMPs at reducing pollutants, and identifying the need for additional BMPs. However, it is unclear whether the SWMP makes effective use of the data provided by the monitoring program.

Action:

- **In the next annual report**, provide in the body of the annual report a text summary of the monitoring results. The summary should clearly identify the pollutants tested for and observed, describe the significance of the results, and compare the results with previous years.
- **Prior to the next annual report**, compare the monitoring results with the list of POCs. If indicated by the comparison, revise the list of POCs in the SWMP to reflect the monitoring results. (However, do not omit from the list of POCs pollutants which turn out not to be a concern in the City's stormwater but which are still a concern in receiving waters.) Include a description of this analysis, and any proposed changes to the list of POCs, **in the next annual report**.
- **Prior to the next annual report**, revise the SWMP to include a BMP to develop a strategy to use the monitoring results to assess the effectiveness of the SWMP and of individual BMPs.



Issue

It is unclear how the outfalls listed in the monitoring results relate to the outfalls indicated on the stormwater map.

Action: In future annual reports, provide a table which identifies the outfalls listed in the monitoring results with the outfalls indicated on the stormwater map.

B. Non-Stormwater Discharges**Issue**

General Permit Section D.2.c (6) lists seventeen categories of non-stormwater discharges or flows and directs MS4s to address them "only where they are identified as significant contributors of pollutants." The City's draft illicit discharge ordinance exempts nearly all of these categories from discharge prohibitions. However, neither the SWMP nor the Annual Report provides adequate detail of the City's analysis of these non-stormwater discharges to determine if they have the potential to be significant sources of pollutants. In particular, the draft ordinance exempts landscape/lawn irrigation and residential car washing even though the SWMP includes detergents, pesticides and fertilizers, and pet waste as POCs.

Action: Prior to the next annual report, revise the SWMP to include a BMP to provide a schedule for the evaluation of non-stormwater discharges identified in General Permit Section D.2.c (6). The BMP shall state that if any of the non-stormwater discharges are found to be significant sources of POCs, additional BMPs will be added to address these non-stormwater discharges.

C. Household Hazardous Waste Collection**Issue**

The data reported in Attachment 13 is difficult to decipher.

Action: In the next annual report, provide in the body of the annual report a text summary of the waste management report. The summary should clearly describe the significance of the information and compare it with previous years.

D. Sources of Illicit and/or Non-Stormwater Discharges**Issue**

The current SWMP is primarily reactive in its approach to illicit discharge detection. While this approach conserves time and expense, it is unclear that it will eliminate illicit discharges, address non-stormwater discharges, or protect water quality to the MEP.

Action: Revise the SWMP prior to the next annual report to include a BMP or BMPs to:

- Identify the most likely sources of illicit and/or non-stormwater discharges, such as restaurants, garbage areas, loading docks, watered landscapes, septic systems, etc.,
- Make regular inspections of potential illicit and/or non-stormwater dischargers,
- Identify, inspect, and limit access to illegal dumping sites.

V. MCM #4: Construction Site Stormwater Runoff Control

The purpose of this MCM is to develop, implement, and enforce a program to reduce pollutants in stormwater runoff from construction activities disturbing one acre or more, or which are part of a larger plan of development. The City has nearly completed the process of adopting a grading



ordinance and BMP manuals for construction activities. Water Board staff provides the following comments to further improve this MCM.

A. Grading Ordinance

Issue

Construction-related stormwater pollutants arise from sources other than erosion and sedimentation. It is unclear whether the grading ordinance will adequately address these other potential pollutant sources, including portable toilets, material storage, waste construction materials, and vehicle and heavy equipment maintenance and storage. Failure to address these sources would be a violation of General Permit Section D.2.d.3.

Action:

- Address all typical potential sources of construction-related stormwater pollution in the ordinance.
- To ensure that the ordinance will effectively reduce pollutants to the MEP, please submit the draft ordinance for review by Water Board staff prior to adoption.

Issue

According to the SWMP, the ordinance was to be adopted in FY 2007-08. However, according to the Annual Report, the City has not met this measurable goal.

Action: Incorporate the above comments into the ordinance and adopt it **prior to the next annual report**.

B. Standards for BMP Selection and Effectiveness

Issue

Practice CS-2 describes the creation of a manual of construction BMPs. However, it is unclear whether the manual, ordinance, or standard specifications include minimum standards for BMP selection and effectiveness. Therefore it is unclear whether the City has minimum standards for construction site stormwater runoff control.

Action: **Prior to the next annual report**, revise BMP CS-2 to include minimum standards for BMP selection and effectiveness.

C. Procedures

Issue

The SWMP does not currently describe procedures for grading plan review or site inspection.

Action: **Prior to the next annual report**, revise the SWMP to accomplish the following:

- Include a BMP to establish procedures for reviewing construction and/or grading permits to ensure compliance with the requirements of the General Permit.
- Include a BMP to establish minimum standards for approving construction and/or grading permit applications to ensure compliance with the requirements of the General Permit.
- Include a BMP to establish procedures for construction site inspections, including minimum standards for site inspection timing and frequency.



D. Training

Issue

The SWMP does not currently include a BMP to provide training for construction/grading permit application reviewers or for construction site inspectors.

Action: Prior to the next annual report, revise the SWMP to include a BMP to establish training and set minimum training requirements for construction/grading permit application reviewers and construction site inspectors.

VI. MCM #5: Post-Construction Stormwater Management

The purpose of this MCM is to develop, implement, and enforce a program to address runoff from new and redevelopment. We commend the City's recognition of the significant role played by land use in the generation and control of urban stormwater pollution and its work to adopt appropriate revisions to the General Plan. Water Board staff provides the following comments to further improve this MCM.

A. Supplemental Provisions (Attachment 4)

Issue

The General Permit includes supplemental provisions that apply to small MS4s serving a population of 50,000 or more, or that are subject to high growth (Finding 18). The definition of "high growth" (Finding 10.b) includes growth which exceeded 25 percent between 1990 and 2000. According to the U.S. Census Bureau, the City of Hollister grew from 19,912 in 1990 to 34,413 in 2000, amounting to 79% growth during this period. However, the SWMP does not currently contain BMPs which address the supplemental provisions described in Attachment 4 to the General Permit. The City must implement the supplemental provisions contained in Attachment 4 to the General Permit by the end of year five. Failure to do so would be a violation General Permit Section D.2.e (3).

Action: Prior to the next annual report, revise the SWMP to include a BMP or BMPs to comply with the supplemental provisions, including a schedule to implement and enforce the provisions of Attachment 4 by the end of year five.

B. Land Use Criteria

Issue

According to the SWMP, the City adopted land use revisions to the General Plan in year 1. However, the content of these revisions has not yet been reported.

Action: As an addendum to this annual report, provide a summary of the land use criteria adopted by the City and incorporated into the City's General Plan.

C. Hydromodification Control Criteria

The Water Board has determined that SWMPs must include BMPs to control the modification of watercourses caused by changes in land use (i.e. "hydromodification controls") in order to meet the MEP standard. The Water Board's expectations for hydromodification control were spelled out in two letters (dated February 15, 2008 and July 10, 2008, respectively) sent to then-enrolled Phase II communities in the Central Coast Region. These requirements are summarized briefly below:

- Rainfall surface runoff at pre-development levels,



- Watershed storage of runoff (through infiltration, recharge, baseflow, and interflow) at pre-development levels,
- Watercourse geomorphic regimes (including stream bank stability and sediment supply and transport) within natural ranges,
- Optimal riparian and aquatic habitats,
- Protection of riparian areas, wetlands, and their buffer zones,
- Long-term watershed protection.

Issue

The SWMP does not yet include a plan for developing numeric hydromodification control criteria. The Water Board expects the City to develop and implement numeric hydromodification control criteria.

Action: Prior to the next annual report, revise the SWMP to include a BMP to develop hydromodification control criteria which comply with the expectations described in the two letters cited above. The BMP should include a schedule to develop, implement, and enforce the criteria for new and redevelopment by the end of FY 2012-13.

D. Interim Hydromodification Control Criteria

The Water Board has determined that regulated MS4s must adopt interim hydromodification control criteria as a step toward establishing final hydromodification criteria. The Water Board's requirements for interim hydromodification control were spelled out in two letters (dated February 15, 2008 and July 10, 2008, respectively) sent to then-enrolled Phase II communities in the Central Coast Region. These requirements are summarized briefly below:

- Adopt the numeric criteria for interim hydromodification control criteria presented by the Water Board within one year of SWMP approval, or
- Provide a schedule to develop alternative interim hydromodification control criteria to be implemented within one year of SWMP approval.

Issue

The SWMP does not yet include a plan for developing interim hydromodification control criteria.

Action: Prior to the next annual report, revise the SWMP to include a schedule for developing interim hydromodification criteria, using one of the options listed below. The criteria must be developed and adopted by the end of FY 2009-10.

Option1

The proposed criteria may include the following types of requirements which provide a high degree of assurance of effective hydromodification control without regard to the nuances of individual watersheds:

- For new and re-development projects, effective impervious area¹ shall be maintained at less than five percent (5%) of total project area.
- For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match

¹ Effective Impervious Area is that portion of the impervious area that drains directly to a receiving surface waterbody via a hardened storm drain conveyance without first draining to a pervious area. In other words, impervious surfaces tributary to pervious areas are not considered Effective Impervious Area.



within one percent (1%) the pre-construction runoff hydrographs, for a range of events with return periods from 1-year to 10-years.

- For projects whose disturbed project area exceeds two acres, preserve the pre-construction drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream² or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration.

Option 2

The City may use the following process to develop interim criteria as effective as the above criteria. "As effective as" means the City may use other approaches (including other variables or numeric criteria, different than Option 1 criteria, appropriate for the Hollister watershed) to control hydromodification and protect the biological and physical integrity of the City's individual watershed. Other acceptable approaches to develop interim criteria that are as effective as Option 1 include:

- A. Adopt and implement hydromodification criteria developed by another local municipality and approved by Board staff, such as the criteria the Water Board adopted for the City of Salinas, as interim criteria;

OR use the following methodology to develop interim criteria:

- B. Include a BMP to develop interim hydromodification criteria, including a period of no less than three (3) weeks to allow for Water Board staff's review of the proposed criteria. The BMP shall state:

"The City shall develop interim flow control and infiltration criteria. These interim criteria shall be developed by the end of FY 2009-10. These interim criteria will be replaced by the final hydromodification control criteria that must be developed by the City by the end of FY 2012-13. For the interim criteria, the City shall:

- "Identify a range of runoff flow rates for which post-project runoff flow rates and durations shall not exceed pre-development runoff rates and durations, where the increased discharge rates and durations will result in off-site erosion or other significant adverse impacts to beneficial uses. Pre-development refers to the soil type, vegetation and amount of impervious surface existing on the site prior to the development project.
- "Establish numeric criteria for development projects to maximize infiltration on-site and approximate natural infiltration levels to the maximum extent practicable and to effectively implement applicable low-impact development strategies.
- "Identify the projects, including project type, size and location, to which the City will apply the interim criteria. The projects to which the City will apply the interim criteria will include all those projects that will cause off-site erosion or other significant adverse impacts to beneficial uses.
- "Identify methods to be used by project proponents to demonstrate compliance with the interim discharge rate and duration criteria, including continuous simulation of the entire rainfall record.

² A first order stream is defined as a stream with no tributaries.



- "Identify methods to be used by project proponents to demonstrate compliance with the interim infiltration criteria, including analysis of site imperviousness."

E. Review Criteria

Issue

Effective implementation and enforcement of hydromodification control criteria—whether interim or final—requires the adoption of adequate project review criteria and procedures. This review should also occur early enough in the project development process to be able to affect the project's goals and design.

Action: Prior to the next annual report, revise the SWMP to include a BMP or BMPs to establish criteria for reviewing projects for compliance with the hydromodification control criteria (interim or final) in place at the time of the review, including a provision for pre-application review.

F. Training for City Planning and Engineering Staff

Issue

Several elements of hydromodification control, including long-term watershed protection and site plan analysis, require the informed involvement of City Planning and Engineering staff. The SWMP does not yet include a provision for training City Planning or Engineering staff in the principles and practice of hydromodification control.

Action: Prior to the next annual report, revise the SWMP to include a BMP to provide hydromodification control training for City Planning and Engineering staff that is consistent with the City's hydromodification control criteria (either interim or final).

VII. MCM #6: Pollution Prevention/Good Housekeeping for Municipal Operations

The purpose of this MCM is to develop and implement an operation and maintenance program, including training, to prevent or reduce pollutants in runoff from municipal operations. The City has worked to achieve this goal by surveying its municipal facilities for potentially polluting situations. Water Board staff provides the following comments to further improve this MCM.

A. Employee Training

Issue

The SWMP establishes a measurable goal to provide annual training to all City employees responsible for SWMP implementation. According to the Annual Report, this training has not occurred.

Action: As an addendum to this Annual Report, provide a schedule for implementing this BMP. The schedule should include the date(s) of training planned for FY 2008-09, the names or departments of staff who will attend, and a summary of the training content.

B. Municipal Activities

Issue

The municipal facility survey does not appear to address all municipal activities or properties. For instance, city parks are not mentioned. In addition, municipal activities such as road and sidewalk repair, water line flushing, trenching and excavation, landscape



irrigation, and landscape chemical application (fertilizer, pesticide, and herbicide) are not included. Therefore it is unclear how the City will manage all of its municipal activities and facilities to prevent or reduce pollutants in stormwater runoff to the MEP.

Action: In the next annual report, indicate how the above mentioned municipal facilities and activities will be managed as part of the City's pollution prevention plan.

Conclusion

Thank you for submitting the City's Annual Report. Water Board staff provides these comments and is available to work with you to achieve a program which is increasingly effective at reducing the discharge of pollutants to the MEP and protecting water quality.

Some of the issues enumerated in this letter require the submission of additional information as an addendum to this annual report. This information is required pursuant to California Water Code Section 13383. We require this information to determine the City's compliance with the General Permit. Water Board staff will contact you within two to three weeks to arrange a meeting with you after you have had an opportunity to review this letter. Part of the purpose of this meeting will be to establish a date by which the additional information must be submitted to the Water Board.

Other issues enumerated in this letter require revisions to the City's SWMP. We require these revisions, pursuant to General Permit Section D, to ensure that the SWMP reduces the discharge of pollutants to the MEP and protects water quality. The next annual report must indicate that you have made these revisions and have taken the required actions.

Any person affected by this action of the Central Coast Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. To petition the State Water Board, Office of Chief Counsel, at P. O. BOX 100, Sacramento, CA 95812, must receive your petition within 30 days of the date of this letter. We can provide copies of the law and regulations applicable to filing petitions upon request or available at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality/index.shtml.

If you have any questions or would like to schedule a meeting, contact **Jon Rohrbough** at (805) 549-3458 or at jrohrbough@waterboards.ca.gov, or Matt Thompson at (805) 549-3159.

Sincerely,

for Lisa A. McCann
Roger W. Briggs
Executive Officer

cc: Steve Wittry
Engineering Manager
City of Hollister
375 Fifth Street
Hollister, CA 95023

S:\Shared\Stormwater\Stormwater Facilities\San Benito Co\Municipal\Hollister\2008 Annual Report\2008 Annual Report Comment Letter MBT.doc

California Environmental Protection Agency



Recycled Paper